$-\overline{Y}$ de maximis, inc.

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May 15, 2018

VIA ELECTRONIC & US MAIL

Ms. Diane Salkie
ATTN: Lower Passaic River Remedial Project Manager
Emergency and Remedial Response Division
U.S. EPA, Region 2
290 Broadway, 19th Floor
New York, New York 10007

Re: Monthly Progress Report No. 132 – April 2018
Lower Passaic River Study Area (LPRSA) Remedial Investigation/Feasibility Study
(RI/FS)
CERCLA Docket No. 02-2007-2009

Dear Ms. Salkie:

de maximis, inc. is submitting this Monthly Progress Report for the above-captioned project on the behalf of the RI/FS Agreement Settling Parties (Cooperative Parties Group or CPG) pursuant to the Administrative Settlement Agreement and Order on Consent (Settlement Agreement or AOC). The Progress Report satisfies the reporting requirements of Paragraph 42 of said Settlement Agreement. The CPG has revised this Progress Report to address the Region's direction in its September 1, 2015 letter about Section (d).

(a) Actions which have been taken to comply with this Settlement Agreement during the previous month.

Meetings/Conference Calls

- On April 2, EPA Region 2 (Region 2), CPG, and Region 2 and CPG consultants held a teleconference to discuss engineering assumptions in the Feasibility Study (FS).
- On April 13, Region 2 and CPG consultants held a teleconference to discuss model calibration issues.
- On April 17, Region 2, CPG and Region 2 and CPG consultants held a teleconference to discuss Sediment Transport (ST) model code changes.
- On April 24, Region 2 and CPG held a meeting to discuss the Contaminated Sediments Technical Advisory Group (CSTAG) recommendations regarding the upper 9 miles of the LPRSA.
- On April 25, Region 2 and CPG consultants held a meeting to provide updates on FS modeling topics, secondary Contaminants of Potential Concern (COPC) calibration status and completion of the bed mass valance closure refinements.

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- On April 27, Region 2 and CPG held a teleconference to discuss CSTAG recommendations for the Upper 9-mile Interim Remedial Action.
- On April 30, Region 2 and CPG held a meeting to review CSTAG recommendations for the Upper 9-mile Interim Remedial Action.

Correspondence

- On April 6, CPG and Region 2 exchanged emails regarding potential meetings to discuss key FS and modeling items.
- On April 6, CPG consultants updated Region 2 consultants on efforts to improve the Chemical Fate & Transport (CFT) Model mass balance closure.
- On April 10, CPG submitted responses to Region 2 to comments on the Upper 9-mile Interim Remedy Plan provided by the National Oceanographic and Atmospheric Administration (NOAA) and United States Fish and Wildlife Service (USFWS).
- On April 11, Region 2 provided feedback on the March 28 Bioaccumulation Model (FWM)
 Calibration Update presentation to CPG; requested model input parameters and
 preliminary model calibrations for the "uncalibrated model"; and confirmed April 24 as the
 date for a meeting to discuss the FS with Region 2.
- On April 11, CPG indicated to Region 2 that the FWM input parameters and calibrations would be sent by the CPG consultant.
- On April 11, CPG provided Region 2 the detailed engineering design FS assumptions discussed during the April 2 teleconference.
- On April 12, CPG provided Region 2 a list of items to be resolved related to the FS and modeling for the Upper 9-mile Interim Remedy.
- On April 12, CPG provided the responses to NOAA and USFWS comments and the CPG's March 1 CSTAG presentation documents to Region 2 for delivery to NOAA and USFWS.
- On April 13, Region 2 consultants provided details related to mass balance code issues and corrected ST model code to CPG consultants.
- On April 13, CPG consultants updated Region 2 consultants on efforts to improve the CFT model mass balance closure.
- On April 16, CPG consultants provided comments to Region 2 consultants regarding potential code changes to the ST model.
- On April 16, CPG delivered the March Monthly Progress Report to Region 2.
- On April 17, Region 2 consultants provided updated code to run the ST model to CPG consultants.
- On April 26, CPG consultants provided presentation materials from the April 25 modeling meeting to Region 2 consultants.
- On April 26, Region 2 provided CSTAG recommendations for the proposed Upper 9-mile Interim Remedial Action to CPG.
- On April 26, Region 2 and CPG exchanged emails scheduling a call on April 27 to review the CSTAG recommendations.

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- On April 27, Region 2 and CPG exchanged input to a proposed agenda for the April 30 meeting to discuss the FS.
- On April 27, Region 2 provided comments from Region 2 and Partner Agencies on the revised Draft 17-mile Remedial Investigation (RI) Report, Sections 1 to 4, to CPG.

Work

- CPG continued work to address Region 2's comments on the revised Draft 17-mile RI Report and Model Appendices.
- CPG continued work on calibration of the revised LPR/Newark Bay CFT model.
- CPG continued work on revision of the LPR FWM.
- CPG continued work on revision of Newark Bay Model documentation.
- CPG responded to CSTAG comments on the Upper 9-mile Interim Remedy.
- CPG responded to Region 2 comments and questions on the Upper 9-mile Interim Remedy.

(b) Results of Sampling and Tests

None.

(c) Work planned for the next two months with schedules relating to the overall project schedule for RI/FS completion

- CPG will continue work on the revised Draft 17-mile RI Report and Model Appendices in response to Region 2 comments. The Executive Summary, Summary, Conclusions, and References Sections of the revised Draft RI Report and Appendix P (Bioaccumulation Modeling) have been partially revised, but additional collaboration with Region 2 is required to complete their revision.
- CPG will continue calibration of the revised LPR/Newark Bay CFT model and continue to work with HDR to complete the calibration.
- CPG will continue revising the LPR FWM pursuant to Region 2 comments.
- CPG will continue work on Newark Bay Model documentation.
- CPG will continue discussions with Region 2 regarding comments on the Upper 9-mile Interim Remedy.

(d) <u>Problems encountered and anticipated problems, actual or anticipated delays, and solutions developed and implemented to address actual or anticipated problems or delays.</u>

 Feasibility Study (FS) – Region 2 and the CPG are currently discussing refocus of the FS to the upper 9 miles and accelerating its completion and met via teleconference



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on January 4, March 8, 15 and 29, 2018 and meetings on February 9, April 2, and April 30, 2018.

- Other Documents There are number of reports and technical memos (both original and revised submissions) that have been submitted to Region since 2011 that the CPG is awaiting either approval or Region 2's comments. These reports include:
 - 1. Upstream Reference Benthic Data Report submitted August 2013
 - 2. Background Sediment Data Report submitted October 2013

If you have any questions, please contact Rob Law or me at (908) 735-9315.

Very truly yours,

de maximis, inc.

Willard Potter

CPG Project Coordinator

cc: Frances Zizila, EPA Region 2 Office of Regional Counsel

William Hyatt, CPG Coordinating Counsel

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